

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America)	
v.)	
)	Case No. 21-1596-M
William Watts, Sr.)	
)	
)	
)	

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 20, 2020 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 2252(a)(1)	Transportation and attempted transportation of child pornography
18 USC 2252(a)(4)(B)	Possession of child pornography

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

/s/ Brian Coughlin

Complainant's signature

Brian Coughlin, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: October 21, 2021

/s/ Honorable Marilyn Heffley

Judge's signature

City and state: Philadelphia, Pennsylvania

Honorable Marilyn Heffley, USMJ

Printed name and title

AFFIDAVIT

I, Brian Coughlin, a Special Agent with the Federal Bureau of Investigation, Philadelphia, Pennsylvania, being first duly sworn, hereby depose and state as follows:

1. I am employed as a Special Agent of the Federal Bureau of Investigation (FBI) in Philadelphia, Pennsylvania. I have been employed as a Special Agent of the FBI since February of 2001. Over the past twenty years, I have investigated white collar crime, public corruption, counterterrorism, violent crimes against children, and the sexual exploitation of children. I have gained experience through training at the FBI Academy, various conferences involving crimes against children, and everyday work related to conducting these types of investigations. I am presently assigned to the Philadelphia Division's Crimes Against Children squad, which investigates sex trafficking of children and prostitution, child pornography, and kidnappings, among other violations of federal law.

2. This affidavit is made in support of a criminal complaint charging WILLIAM WATTS, SR. with transportation and attempted transportation of child pornography, in violation of 18 U.S.C. § 2252(a)(1), and possession of child pornography, in violation of 18 U.S.C. § 2252(a)(4)(B), on or about November 20, 2020, as outlined below.

3. As a federal agent, I am authorized to investigate violations of laws of the United States and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

4. The statements in this Affidavit are based on my investigation and other law enforcement officers' investigation of this matter. Because this Affidavit is being submitted for the limited purpose of demonstrating probable cause in support of the attached criminal complaint,

I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause for the arrest of WILLIAM WATTS, SR.

BACKGROUND OF THE INVESTIGATION

5. Oath Inc. is a multi-national corporation with its headquarters located in Dulles, Virginia. The company provides a variety of on-line services to the public, including electronic mail (“email”) access. Oath Inc. allows subscribers to obtain email accounts at the domain name AOL.com. Subscribers obtain an account by registering with AOL.com. During the registration process, subscribers will be asked to provide basic personal information, which may or may not be verified.

6. In addition to email services, an AOL.com subscriber can also store certain files on servers maintained and/or owned by Oath Inc., to include address books, contact or buddy lists, calendar data, image and video files (other than ones attached to emails), and other files.

7. The National Center for Missing and Exploited Children (hereinafter “NCMEC”) receives complaints via their CyberTipline from Internet Service Providers (“ISPs”), Electronic Service Providers (“ESPs”), and others. These CyberTipline reports are reviewed by a NCMEC analyst and forwarded to Law Enforcement for further investigation of the information provided in the CyberTipline report. ISPs, ESPs, and others may physically view a picture, video, or any other content that they would then report to NCMEC.

8. On November 20, 2020, Oath Inc. filed a CyberTipline that the account of wwattssr@aol.com had transmitted images that depicted suspected child pornography by emailing them from the account wwattssr@aol.com to the same account. Personnel at Oath Inc. reviewed

the files before submitting the information to NCMEC's CyberTipline. Your Affiant reviewed the 12 files included with the CyberTipline report, and in your Affiant's opinion, all 12 of these files depict child pornography within the meaning of 18 U.S.C. § 2256. The files included the following:

- a. On November 18, 2020, at 16:59:01 UTC, the user transmitted a video file titled "fd2a8023-9478-4b7d-bd2a-b9de030de32d.mp4." The video file depicts a prepubescent girl, approximately 8 to 12 years of age, wearing only a shirt and exposing her vagina and anus while posing on a bed. An adult male inserts his erect penis in her mouth.
- b. On November 20, 2020, at 11:10:02 UTC, the user transmitted a video file titled "6202bf76-7c39-4f77-80d0-a6c2297a05d8.mp4." The video file depicts a prepubescent girl, approximately 4 to 8 years of age, performing oral sex on a prepubescent boy, approximately 4 to 8 years of age.
- c. On November 20, 2020, at 11:10:02 UTC, the user transmitted a video file titled "90a41a89-cd41-46f7-b3e9-a5a874d30aa5.mp4." The video file depicts a prepubescent girl, approximately 4 to 8 years of age, performing oral sex on a prepubescent boy, approximately 4 to 8 years of age.

9. Oath Inc. identified the account holder as:

- a. Name: William Watts Sr.
- b. Address: 19142 US
- c. Date of Birth: 03-xx-1966
- d. Mobile Phone: 2158508673 (Verified on 7/20/2019 at 23:57:42 UTC)

e. Email: wwattssr@aol.com.

10. Oath Inc. identified that on November 18, 2020, 15:19:33 UTC, the account had been accessed from IP address, 2601:43:c200:5a10:30d5:64e5:1de:371f. Per the American Registry for Internet Numbers (www.arin.net), this IP address is assigned to Comcast. Pursuant to an Administrative Subpoena issued by the Philadelphia Division of the FBI, Comcast identified the residential internet subscriber of this IP address at the specified date and time as Cecelia Knoble-Watts, at the same address in Philadelphia, Pennsylvania where WILLIAM WATTS, SR. resides.

11. The residential address to which this Comcast IP address is subscribed is the same address WATTS uses on his Pennsylvania Driver's License. According to the City of Philadelphia property records, as of October 15, 2021, WATTS and Cecilia Knoble-Watts are the listed owners of this residence.

12. Additionally, Oath Inc. identified that the same account had been accessed on November 20, 2020 at 00:38:59 UTC from a different IP address, 2600:1002:b00a:7dc5:dda0:cb3b:9d7d:cd41. Per the American Registry for Internet Numbers (www.arin.net), that IP address is assigned to Verizon. Pursuant to an Administrative Subpoena issued by the Philadelphia Division of the FBI, Verizon identified the assigned mobile telephone number as 215-850-8673.

13. As noted above, Oath Inc. identified the suspect account holder's cellphone number as 215-850-8673 (verified by Oath Inc. on July 20, 2019). Pursuant to an Administrative Subpoena issued by the Philadelphia Division of the FBI, Verizon identified the subscriber of mobile telephone number 215-850-8673, since July 2019, as WILLIAM WATTS, SR., at his residence in

Philadelphia, Pennsylvania 19142.

14. A search of Pennsylvania Department of Labor and Employment Records identified WILLIAM WATTS, SR. by social security number as an employee of the City of Philadelphia. WATTS is a Philadelphia Police Officer, assigned to Philadelphia's First Police District.

15. A federal search warrant was authorized and executed for the Oath, Inc. AOL account associated with email address wwattssr@aol.com., and Oath, Inc. provided records in response. The account contained approximately 449 emails. Your Affiant located all 12 of the files reported by NCMEC via the CyberTipline Report in the "Sent" folder and the "Saved" folder. In your Affiant's opinion, all 12 of these files depict child pornography within the meaning of 18 U.S.C. § 2256.

16. Amongst the approximately 449 emails, your Affiant found multiple files that depict an individual who appears identical to the driver's license photo of WILLIAM WATTS, SR. Some of these included "selfie" style photographs.

17. The login history provided by Oath Inc. included the same IP addresses reported by NCMEC via the CyberTipline Report. As discussed above, on November 18, 2020, the account was accessed from a Comcast IP address subscribed to Cecilia Knoble-Watts at WILLIAM WATTS SR.'s residence; on November 20, 2020, the account was accessed from a Verizon IP address assigned to the mobile phone number subscribed to WATTS.

18. On October 20, 2021, United States Magistrate Judge Marilyn Heffley, Eastern District of Pennsylvania, authorized a search and seizure warrant for the person of WILLIAM WATTS, SR. and his residence.

19. On October 21, 2021, the FBI executed this search warrant and came into contact

with WATTS outside his residence. Agents advised WATTS that they had a search warrant for his residence and body. They also advised WATTS that he was not currently under arrest and was free to leave. WATTS agreed to speak to agents about the investigation. In summary, WATTS admitted that he downloaded images of child pornography from the social media messaging application “WhatsApp,” and saved them into his AOL account, [williamwattss@aol.com](mailto:wiliamwattss@aol.com). WATTS stated that he searched specifically for “child sex” in WhatsApp. WATTS admitted to viewing child pornography and masturbating to the images. WATTS explained that he looked for child pornography on WhatsApp because he was no longer sexually satisfied by images of adult pornography. WATTS was shown still images of the videos of child pornography described in paragraph 8. He acknowledged that those were some of the images he received from WhatsApp and moved into his AOL account.

CONCLUSION

21. Based on the information above, I respectfully submit that there is probable cause to believe that WILLIAM WATTS, SR. committed violations of 18 U.S.C. §§ 2252(a)(1) (transportation and attempted transportation of child pornography) and 2252(a)(4)(B) (possession of child pornography) on or about November 20, 2020. Therefore, I respectfully request that the attached form of criminal complaint be issued for the arrest of WILLIAM WATTS, SR.

/s/ Brian Coughlin

Brian Coughlin
Special Agent, FBI

Sworn and subscribed to before me
this 21st day of October, 2021.

/s/ Honorable Marilyn Heffley

HONORABLE MARILYN HEFFLEY
United States Magistrate Judge
Eastern District of Pennsylvania

Attachment A

Count One – Transportation of Child Pornography – 18 U.S.C. § 2252(a)(1), (b)(1)

On or about November 20, 2020, in Philadelphia, in the Eastern District of Pennsylvania, defendant WILLIAM WATTS, SR., knowingly transported, using a means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, that is, by computer, visual depictions, the producing of which involved the use of minors engaged in sexually explicit conduct, and the visual depictions were of such conduct, and attempted to do so.

Count Two – Possession of Child Pornography, 18 U.S.C. § 2252(a)(4)(B), (b)(2)

On or about November 20, 2020, in Philadelphia, in the Eastern District of Pennsylvania, defendant WILLIAM WATTS, SR., knowingly possessed matter, that is, an AOL.com email account, which contained visual depictions that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce. The production of these visual depictions involved the use of minors, including prepubescent minors and minors who had not attained 12 years of age, engaging in sexually explicit conduct, and the visual depictions were of minors engaging in sexually explicit conduct.